

Exhibit A

I. Facts to Be Deemed Established

Plaintiffs respectfully request that the following facts be established for purposes of this action:

1. Defendant Ray was a writer for *The Daily Stormer* from at least July 2016 through at least March 2020.

2. Defendant Ray entered into an agreement with one or more coconspirators to plan the Unite the Right event that took place in Charlottesville, Virginia on August 11 and 12, 2017.

3. Defendant Ray entered into an agreement with one or more coconspirators to engage in racially motivated violence in Charlottesville, Virginia on August 11, 2017.

4. Defendant Ray entered into an agreement with one or more coconspirators to engage in racially motivated violence at the Unite the Right event in Charlottesville, Virginia on August 12, 2017.

5. Defendant Ray was motivated by animus against racial minorities, Jewish people, and their supporters when conspiring to engage in acts of intimidation and violence on August 11 and 12, 2017, in Charlottesville, Virginia.

6. It was reasonably foreseeable to Defendant Ray and intended by him that coconspirators would commit acts of racially motivated violence and intimidation at the torchlight event in Charlottesville, Virginia on August 11, 2017.

7. It was reasonably foreseeable to Defendant Ray and intended by him that coconspirators would commit acts of racially motivated violence and intimidation at the Unite the Right event in Charlottesville, Virginia on August 12, 2017.

8. It was reasonably foreseeable to Defendant Ray and intended by him that a coconspirator would engage in racially motivated violence by intentionally driving a car into a crowd of counter-protestors on August 12, 2017.

9. Defendant Ray committed multiple overt acts in furtherance of the conspiracy he entered into to commit racially motivated violence at the Unite the Right event in Charlottesville, Virginia on August 12, 2017.

10. Defendant Ray attended the torchlight march on August 11, 2017, and committed acts of intimidation and violence in furtherance of the conspiracy.

11. Defendant Ray attended the Unite the Right event on August 12, 2017 and committed acts of intimidation and violence in furtherance of the conspiracy.

12. After the Unite the Right event in Charlottesville, Virginia on August 11 and 12, 2017, Defendant Ray ratified the racially motivated violence that occurred at Unite the Right.

II. Documents to Be Deemed Authentic

Plaintiffs respectfully request that all documents Plaintiffs have a good-faith basis to believe were in fact created by Defendant Ray be deemed “authentic” for purposes of satisfying Rule 901 of the Federal Rules of Evidence. In particular, Plaintiffs have a good-faith basis to believe that the following social media accounts, identified by the platform name, followed by the handle (or username), belong to Defendant Ray. Plaintiffs respectfully request that all documents, photographs, and videos from the following social media accounts be deemed “authentic” for purposes of satisfying Rule 901 of the Federal Rule of Evidence:

1. Discord - Azzmador
2. Discord - Azzmador 6970

3. Skype - azzmador.returns
4. Twitter - The Azzmador
5. Twitter - Azzmador1488
6. Gab.ai - Azzmador
7. The Krypto Report - Azzmador
8. The Daily Stormer – Azzmador

Plaintiffs additionally request that any photographs or videos that Plaintiffs have a good-faith basis to believe were either taken by Ray, or depict Ray, be deemed “authentic” for purposes of satisfying Rule 901 of the Federal Rules of Evidence.

